

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

IN RE: TAXOTERE (DOCETAXEL)
PRODUCTS LIABILITY LITIGATION

MDL NO. 2740

SECTION "N" (5)
JUDGE ENGLEHARDT
MAG. JUDGE NORTH

MARLENE R. CONNER,

Plaintiff,

v.

SANOFI S.A., AVENTIS PHARMA S.A.,
SANOFI US SERVICES INC. f/k/a SANOFI-
AVENTIS U.S. INC., SANOFI-AVENTIS
U.S. LLC, HOSPIRA WORLDWIDE, LLC
f/k/a HOSPIRA WORLDWIDE, INC.,
HOSPIRA, INC., SUN PHARMA GLOBAL
FZE, and SUN PHARMACEUTICAL
INDUSTRIES, INC. f/k/a CARACO
PHARMACEUTICAL LABORATORIES
LTD.,

Defendants.

**COMPLAINT AND DEMAND FOR JURY
TRIAL**

Civil Action No.: 2:17-cv-9151

SHORT FORM COMPLAINT

Plaintiff(s) incorporate by reference the Amended Master Long Form Complaint and Jury Demand filed in the above referenced case on March 31, 2017. Pursuant to Pretrial Order No. 15, this Amended Short Form Complaint adopts allegations and encompasses claims as set forth in the Amended Master Long Form Complaint against Defendant(s).

Plaintiff(s) further allege as follows:

1. Plaintiff:

Marlene R. Conner

2. Spousal Plaintiff or other party making loss of independent/secondary claim (i.e., loss of consortium):

N/A

3. Other type of Plaintiff and capacity (i.e., administrator, executor, guardian, conservator):
N/A

4. Current State of Residence: Georgia

5. State in which Plaintiff(s) allege(s) injury: Georgia

6. Defendants (check all Defendants against whom a Complaint is made):

a. Taxotere Brand Name Defendants

- ☒ A. Sanofi S.A.
- ☒ B. Aventis Pharma S.A.
- ☒ C. Sanofi US Services Inc. f/k/a Sanofi-Aventis U.S. Inc.
- ☒ D. Sanofi-Aventis U.S. LLC

b. Other Brand Name Drug Sponsors, Manufacturers, Distributors

- ☐ A. Sandoz Inc.
- ☐ B. Accord Healthcare, Inc.
- ☐ C. McKesson Corporation d/b/a McKesson Packaging
- ☒ D. Hospira Worldwide, LLC f/k/a Hospira Worldwide, Inc.
- ☒ E. Hospira, Inc.
- ☒ F. Sun Pharma Global FZE
- ☒ G. Sun Pharmaceutical Industries, Inc. f/k/a Caraco Pharmaceutical Laboratories Ltd.
- ☐ H. Pfizer Inc.
- ☐ I. Actavis LLC f/k/a Actavis Inc.
- ☐ J. Actavis Pharma, Inc.
- ☐ K. Other:

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7. Basis for Jurisdiction:

- ☒ Diversity of Citizenship
☐ Other (any additional basis for jurisdiction must be pled in sufficient detail as required by the applicable Federal Rules of Civil Procedure:

8. Venue:

District Court and Division in which remand and trial is proper and where you might have otherwise filed this Short Form Complaint absent the direct filing Order entered by this Court:

United States District Court, Southern District of Georgia

9. Brand Product(s) used by Plaintiff (check applicable):

- ☐ A. Taxotere
☐ B. Docefrez
☐ C. Docetaxel Injection
☐ D. Docetaxel Injection Concentrate
☒ E. Unknown
☐ F. Other:

10. First date and last date of use (or approximate date range, if specific dates are unknown) for Products identified in question 9:

Approximately December 2010 to March 2011

11. State in which Product(s) identified in question 9 was/were administered:

Georgia

12. Nature and extent of alleged injury (including duration, approximate date of onset (if known), and description of alleged injury:

Disfiguring permanent alopecia beginning sometime after treatment with Taxotere (docetaxel) and continuing to present

13. Counts in Master Complaint brought by Plaintiff(s):

- ☒ Count I – Strict Products Liability – Failure to Warn
- ☒ Count II – Strict Products Liability for Misrepresentation
- ☒ Count III – Negligence
- ☒ Count IV – Negligent Misrepresentation
- ☒ Count V – Fraudulent Misrepresentation
- ☒ Count VI – Fraudulent Concealment
- ☒ Count VII – Fraud and Deceit
- ☒ Count VIII – Breach of Express Warranty (Sanofi Defendants only)
- ☐ Other: Plaintiff(s) may assert the additional theories and/or State Causes of Action against Defendant(s) identified by selecting “Other” and setting forth such claims below. If Plaintiff(s) include additional theories of recovery, for example, Redhibition under Louisiana law or state consumer protection claims, the specific facts and allegations supporting additional theories must be pleaded by Plaintiff in sufficient detail as required by the applicable Federal Rules of Civil Procedure.

14. Name of Attorney(s), Bar Number(s), Law Firm(s), Phone Number(s), Email Address(es) and Mailing Address(es) representing Plaintiff(s):

By: /s/ Karen Barth Menzies

Karen Barth Menzies (*pro hac vice*)
Cal. Bar No. 180234

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